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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§
Charles Raymond Ford, Jr.	§ CASE NO. 08-70451-HDH-13
AND	§
Victoria Ford	§
DEBTORS	§

DEBTORS' OBJECTION TO ALLOWANCE OF CLAIM
OF Herring Bank (Claim #17-1)

Come now Debtors in the above-entitled cause and file this Objection to the Claim filed in this matter by Herring Bank and would respectfully show the Court as follows:

1. Herring Bank has filed a purported secured Proof of Claim (Claim #17-1) for \$4,546.86.
2. Claimant did not attach sufficient and/or legible documents to evidence a perfected lien or security interest in property of Debtors' estate as required by Bankruptcy Rule 3001(d).
3. Claim should be allowed as unsecured only.

WHEREFORE, PREMISES CONSIDERED, Debtors pray that the claim of Herring Bank (Claim #17-1) is disallowed as secured, allowed as unsecured and for additional or alternative relief as may be just and proper.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtor(s)

IMPORTANT NOTICE

PURSUANT TO LOCAL BANKRUPTCY RULE 9007, YOU ARE HEREBY NOTIFIED THAT NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT ON OR BEFORE THIRTY (30) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING WILL BE HELD WITH NOTICE TO (1) THE DEBTOR AND DEBTOR'S ATTORNEY; (2) THE OFFICE OF THE U.S. TRUSTEE; (3) ANY TRUSTEE AND THE TRUSTEE'S ATTORNEY; (4) THE MEMBERS OF ANY OFFICIAL COMMITTEE, OR THE ATTORNEY FOR ANY OFFICIAL COMMITTEE IF AN ATTORNEY HAS BEEN EMPLOYED; OR, IF THERE IS NO COMMITTEE, THE TWENTY (20) LARGEST UNSECURED CREDITORS; (5)

ANY PARTY REQUESTING NOTICE; (6) ANY PARTY NAMED ON A COURT-APPROVED ALTERNATIVE SERVICE LIST; (7) THE RESPONDING PARTIES; AND (8) ANY OTHER AFFECTED ENTITY.

IF NO HEARING ON SUCH NOTICE OR MOTION INITIATING A CONTESTED MATTER IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

CERTIFICATE OF SERVICE

The undersigned hereby certified that on August 12, 2009, a true and correct copy of the foregoing was served on the following parties in interest:

CHAPTER 13 TRUSTEE

Mr. Walter O'Cheskey
6308 Iola
Lubbock, TX 79424

DEBTORS

Charles Raymond Ford, Jr.
Victoria Ford
1321 Lamar
Vernon, TX 76384

U.S. TRUSTEE

William T. Neary
1100 Commerce, Rm. 9C60
Dallas, Texas 75242

CREDITOR

Herring Bank
1900 Pease St
Vernon, TX 76384

/s/Monte J. White

Attorney for Debtor(s)